



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

FILED

03/08/22

02:08 PM

C2203009

Martha Cocking,

,

Complainant,

vs.

Southern California Edison Company (U338E),

Defendant.

ECP Case (C.) _____

Expedited Complaint
(Rule 4.6)

COMPLAINANT	DEFENDANT
Martha Cocking 1901 Brea Burn Drive Corona CA 92882 T: 714-745-5315 E-mail: mmccec384@gmail.com	Southern California Edison Company (U338E) Attn: Anna Valdborg, Director & Managing Attorney 2244 Walnut Grove Avenue Rosemead, CA 91770 T-626-302-6008 E-mail 1: Anna.Valdborg@sce.com E-mail 2: case.admin@sce.com

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) Martha M. Cocking

COMPLAINANT(S)

VS.

(B) Southern California Edison Company

DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES ☐ NO

Has staff responded to your complaint?

☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?

☒ YES ☐ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$ _____

Is your service now disconnected?

☐ YES ☒ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Martha M. Cocking	PO Box 861, Corona, CA 92878-0861	714-745-5315

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
Southern California Edison Company	PO Box 800, Rosemead, CA 91770-0800	800-655-4555

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation)

The OpenWay Electrical Meter by Itron that is assigned to my home suddenly and without any notice to me started to record nearly double the number of kWh used by my residence on December 28, 2020. This problem continued until May 8, 2021, when the meter was temporarily freed from of its load and then it began to operate normally once again. The cause for this event remains a mystery since my electrical usage remained at its normal usage. A review of all of the facts indicates that the finding that the meter was reporting incorrect data to Southern California Edison (SCE). A detailed explanation is on the attachment which consists of four sections:

The Problem: What happened to me.

The Circumstances: What are the known facts regarding the meter.

The Cure: How the meter was corrected.

The Remedy: What SCE is required to do by law to correct the meter's error.

(G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☒ YES ☐ NO

(3) ☒ Regular Complaint ☐ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

The OpenWay Meter submitted incorrect data regarding my electical usage from December 28, 2020 to May 8, 2021. Why was the data from the meter incorrect?

Southern California Edison should credit my account in the amount of \$1,379.28. The computation of this amount is contained in the attachment beginning on page 7.

The facts in dispute are of such nature that a hearing before a judge is requested

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	04/01/2022
Hearing (Example: 7/1/09)	04/22/2022

Explain here if you propose a schedule different from the above guidelines.

(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

A credit of \$1,379.28 be applied to my account.

(I)

OPTIONAL: I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

mmcccec384 gmail.com and dhonaker gmail.com

(J)

Dated Corona, California , California, this 20th day of February , 2022
(City) (date) (month) (year)

/s/ Martha M. Cocking

Signature of each complainant

(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)

(K)**REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	
Address:	
Telephone Number:	
E-mail:	
Signature	

VERIFICATION
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(L)

Executed on February 20, 2022, at Corona, California
(date) (City)

/s/ Martha M. Cocking
(Complainant Signature)

VERIFICATION
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

(M)

Executed on _____, at _____, California
(date) (City)

Signature of Officer

Title

(N) NUMBER OF COPIES NEEDED FOR FILING:

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

(O) Mail paper copies to: California Public Utilities Commission
Attn: Docket Office

505 Van Ness Avenue, Room 2001
San Francisco, CA 94102

PRIVACYNOTICE

This message is to inform you that the Docket Office of the California Public Utilities Commission (“CPUC”) intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC’s website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

/s/ Martha M. Cocking

Signature

February 20, 2022

Date

Martha M. Cocking

Print your name

The Problem

Without my knowledge the electric meter started to send to SCE incorrect data regarding my electrical usage on or about December 28, 2020. This situation continued until May 8, 2021, during my efforts to identify the cause for the high usage. All of the data in the charts below was obtained from SCE's website. SCE has alleged that I had increased my usage during these 132 days. I am prepared to state under the most severe penalties of perjury that this did not occur. Unfortunately it is impossible for me to prove a negative since that is illogical reasoning. However, all of the other facts and circumstance to reach the conclusion that the meter was sending out incorrect data. Figures 1 and 2 below illustrate the period in question where my electrical usage was reported incorrectly.

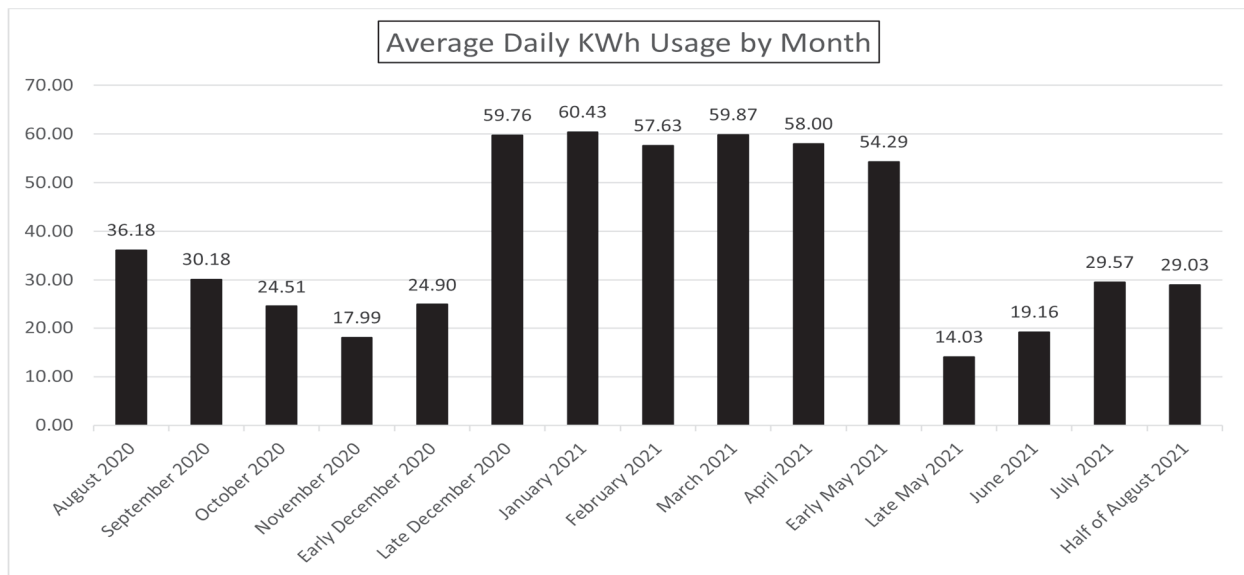


Figure 1

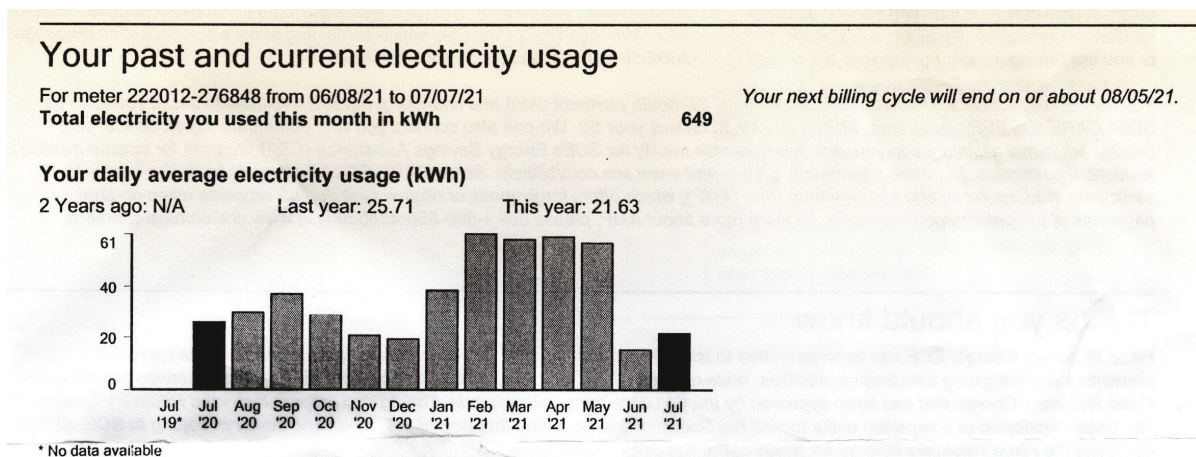


Figure 2

Another way to illustrate the discrepancy is in the chart below which was created directly from the data on SCE’s website regarding my usage. My average kWh daily usage before the malfunction occurred was 26.96 kWh per day. After the malfunction, it was 22.60 kWh day. During the malfunction it was 58.79 kWh per day. It should be noted that both the periods before and after the malfunction included many dates that the use of the central air conditioner was used because of the hot weather. Yet the daily average was well below the average during the malfunction. Figure 3 illustrates this data.

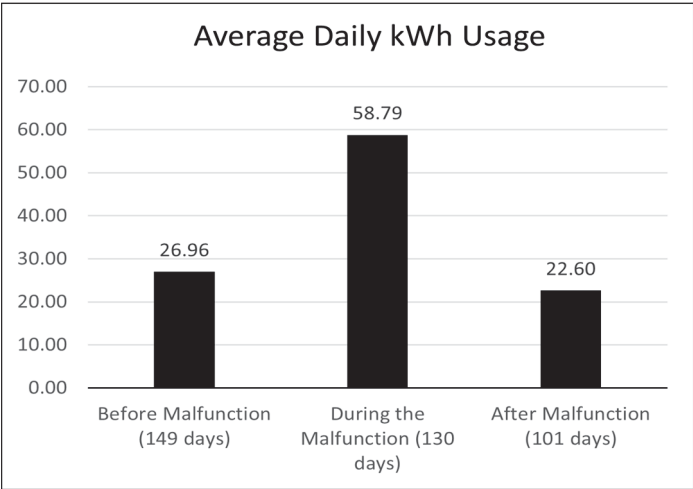


Figure 3

To illustrate the absurdity of the billing, early in the morning of April 29, 2021, I left for a vacation in the Seattle area and returned home on May 7, 2021. During this time there was no one in the house, no air conditioning or lights were used except for the nominal usage by the refrigerator and home security system. Yet the usage was very high in an unoccupied house. After my return and the meter was “reset” on May 8, 2021, the usage dropped dynamically as shown below in spite of all the normal living activities resumed such as using the air conditioning, entertainment systems, lights, etc Figure 4 reflects the daily kWh reported when I was absent from my home and Figure 5 reflects the daily kWh upon my return AFTER the meter had been “reset.” How can an empty house use nearly 5 times as much electricity as one that is being lived in by the owner?

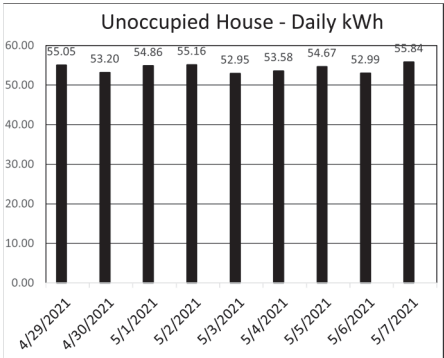


Figure 4

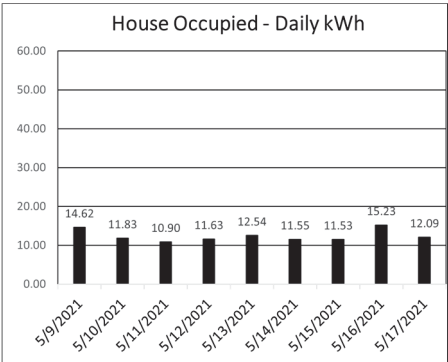


Figure 5

The Circumstances: What are the known facts regarding the meter.

The OpenWay Meter by Itron is an extremely complex component in the electrical delivery system and is thus subject to a variety of failures.

The OpenWay Meter contains at least three electronic circuit boards, two radio transceivers and a variety of other electronic components. In essence, the meter is basically a highly sophisticated computer designed to measure the number of kWh used and then transmit that data to a nearby Collector. Because all of these are physical units and/or waves of electromagnetic energy, their functionality can be destroyed by any manufacturing defect, external factors such as excessive heat, vibration, or even by other electromagnetic waves.

Therefore it would not be an unusual occurrence for these meters to malfunction in one way or another. This is precisely why Itron recommended that all meters be returned to Itron, Inc. to make the necessary repairs. (Exhibit 1, *Technical Reference Guide*, Page 5). Indeed, my friend who helped me research for this hearing had his own electric meter recently replaced by SCE after it had failed to work properly.

SCE's testing of the meter was inherently flawed.

As stated above, the meter malfunctioned from December 28, 2020, to May 8, 2021, after which time it resorted back to its normal operations. It wasn't until at least a week later that the representative from SCE arrived to inspect the meter. At that time he stated that the meter was working correctly. Yes, it may have been AT THE TIME OF HIS INSPECTION. but the meter wasn't tested when it was malfunctioning. However, what is also of even more significance is what he didn't report.

Although the meter has the capability to store any error codes which are usually retrievable, the representative from SCE didn't indicate whether or not there were any error codes present that may have indicated whether or not the meter had been operating correctly. (See Exhibit 1, page 102 and following) When specifically asked about the potential presence of these codes, there was no response from SCE. The meter also has the ability to utilize the Collection Engine to run programmable diagnostic checks. (See Exhibit 1, page 126 and following) There was no mention by SCE as to whether these checks were utilized in testing the meter.

The Cure: How the meter was corrected

On May 8th, after I had returned home and checked the meter readings. As noted above, I was shocked to see the same extraordinarily high usage had continued even during my absence. I was determined to get to the bottom of the problem by trouble shooting all of the circuits to find out which one was using the very high amperage. I did this by taking the following steps:

1. Turned off all of the circuit breakers and then the main breaker.

2. Waited about 45 minutes to get everything into a “steady state.” During this time, no electrical usage was recorded by the meter.
3. After turning the main breaker back on, I then began turning the individual circuit breakers back on one at a time, pausing long enough to check to see if there was any unusual amperage draw on any one circuit.
4. After turning all of the individual circuits back on, I was shocked to see that the power consumed by the entire home was back to normal. Please see Figure 6 below with the data being provided by SCE, to verify the sudden resumption of normal operation by the meter.
5. This trouble-shooting procedure started shortly after 2:00 pm on May 8, 2021.

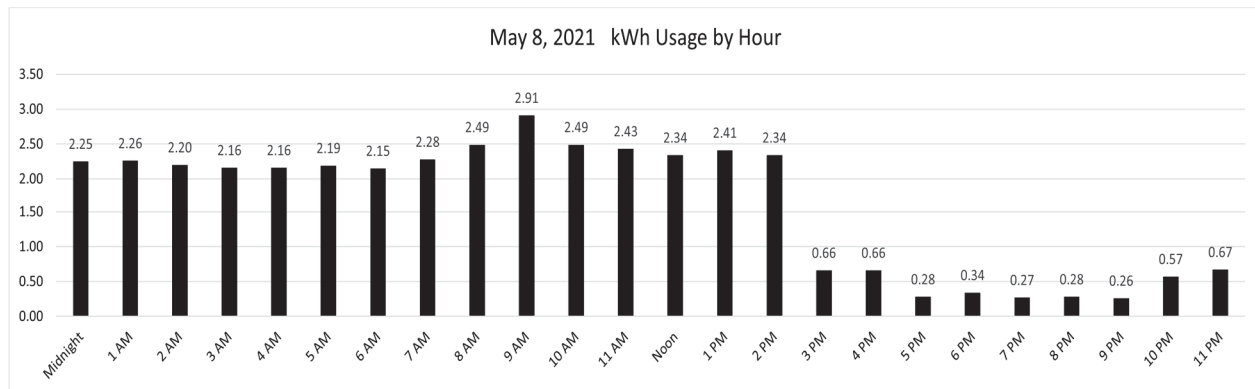


Figure 6

It is common knowledge that when a highly sophisticated electrical component fails to operate correctly that a mere switching the device off for a period of time and then turning it back on will reset the device so that once again it will be operating correctly. This is apparently what happened here; as soon as the load was taken from the meter, something internally was reset to cause it to correct itself. It is far beyond my technical expertise to try to identify exactly what it was for the meter to start operating correctly. SCE has been of no assistance in identifying the problem. But clearly, with the same appliances, etc., being used after the “resetting” has before and much less current is being reported, the problem must be with the meter. The reduced amount of amperage as being reported to SCE by the meter continues to this very date.

The Remedy: What SCE is required to do by law to correct the meter’s error.

In Table 7 shown below you’ll find how the calculations were done to determine the amount of overbilling. The actual steps are outlined below:

1. The correctly billed amounts were identified which included 5 monthly bills before the meter malfunctioned and the 3 months afterwards.

2. The correctly billed amounts totaled \$1,357.93 and over a period of 8 months averaged \$169.74
3. The incorrectly billed amounts were the 5 monthly bills while the meter wasn't working properly.
4. The total of the incorrectly billed amounts was \$2,227.99 over a period of 5 months with the average being \$445.60.
5. An average of \$275.86 (\$445.60 - \$169.74) was being over charged for each of the 5 months.
6. Thus the total of the over charged amount of billing equals 5 time \$275.86 or \$1,379.28

\$1,379.28 is the total amount a billing adjustment by SCE that I am requesting.

Table 7

<u>Billing Date</u>	<u>Energy Charges</u>		<u>Billing Date</u>	<u>Energy Charges</u>
Correct Bills:			Incorrect Bills:	
08/12/20	\$183.76		01/13/21	\$312.24
09/11/20	\$259.68		02/11/21	\$509.47
10/13/20	\$187.98		03/11/21	\$490.02
11/12/20	\$147.98		04/11/21	\$454.03
12/20/20	\$153.66		05/07/21	\$462.23
06/08/20	\$104.07			
07/08/20	\$115.76			
08/06/20	\$205.04			
Total Correct Billing:	\$1,357.93		Total Incorrect Billing:	\$2,227.99
Number of Months:	8		Number of Months:	5
Average Correct Bill per Month:	\$169.74		Average Incorrect Bill per Month:	\$445.60
Average Monthly Incorrect Billing:			\$445.60	
Average Monthly Correct Billing:			<u>\$169.74</u>	
Average Overcharging per Month:			\$275.86	
5 Months Overcharging Equals:			\$1,379.28	(5 X \$275.86)